



Steven M. Neuhaus
County Executive

ORANGE COUNTY DEPARTMENT OF LAW

RICHARD B. GOLDEN
COUNTY ATTORNEY

Carol C. Pierce
Deputy County Attorney

Municipal Law Division

TEL: 845-291-3150
FAX: 845-378-2374*

Kellie E. Lagitch *Chief Assistant – Litigation*
Matthew J. Nothnagle *Chief Assistant – Appeals*
Susan L. Whalan *Chief Assistant – Contracts*
Joseph F. Mahoney Holly L. Reinhardt
Marina V. O'Neill Donna M. Badura
Lisa M. James Stephanie T. Midler
Lia E. Fierro Lisa M. Morgillo
Cedric A. Cooper William S. Badura
Dante D. De Leo

Family Law Division

TEL: 845-291-2650
FAX: 845-360-9161*

Kimberly C. VanHaaster *Chief Assistant – Family Div.*
Peter R. Schwarz David S. Meffert
Linda P. DaSilva Stephanie Bazile
Ferol L. Reed-McDermott Michael Rabiot
Karen A. Amundson Tammy A. Delile
Eve I. Lincoln Rebecca McGee
Stephen Toole

June 2, 2025

Via ECF Only

Honorable Philip M. Halpern
United States District Judge
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, NY 10601-4150

Re: Request for time to file Amended Complaint and Respond
Vargas (v) Orange County et al.
Case No.: 7:25-cv-00064 (PMH)

Dear Judge Halpern:

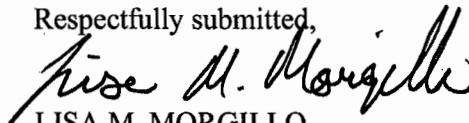
This office represents Defendant Orange County. On May 15, 2025, my office received Plaintiff's Complaint. Pursuant to the Court's Individual Rules of Practice, on May 23, 2025, we sent a letter to Plaintiff's counsel setting forth what we believed to be specific pleading deficiencies in the Complaint that would warrant dismissal. On June 2, 2025, we received a response from Plaintiff's Counsel seeking sixty days to file an Amended Complaint.

Orange County Government Center
255-275 Main Street, Goshen, NY 10924

**Service of Process by FAX is not accepted*

Therefore, subject to the Court's approval we collectively and respectively request the following extensions: Plaintiff to file an Amended Complaint by August 1, 2025 and Defendant Orange County to Answer or file a pre-motion letter seeking leave to file a motion to dismiss by August 29, 2025.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lisa M. Morgillo", is written over the typed name.

LISA M. MORGILLO
Assistant County Attorney

cc: Elena Louisa Cohen, esq.
via ECF

Gideon Orion Oliver, esq.
via ECF

Remy Green, esq.
via ECF